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November 19, 2012

Via Email thampton@fec.gov and US Mail

Mr. Jeff S. Jordan
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: MUR 6664

Dear Mr. Jordan:

On behalf of Wall for Congress, Florence Magnuson as Treasurer, James Wall and Paula Zellner (collectively, the "Respondents"), this letter is submitted in response to the Federal Election Commission (the "FEC")'s notification that it has received a Complaint and Supplemental Complaint alleging that Respondents have violated the Federal Election Campaign Act ("FECA" or "the Act"). For the reasons set forth below, the FEC should find no reason to believe that the Respondents violated the Federal Election Campaign Act of 1971, as amended, or the FEC's regulations, and it should dismiss this matter forthwith.

The Complaint appears to assert that the Respondents violated the Act as a result of the Respondents' alleged receipt of in-kind corporate contribution from Service Employees International Union ("SEIU") and/or Wisconsin Jobs Now! However, Respondents received no in-kind, corporate contribution from either of these entities. Accordingly, the Complaint is factually and legally baseless and the Commission should refuse to take further action on the Complaint, and close the matter.

The Commission should dismiss Respondents from this action for the following four reasons:

First, Respondent Paula Zellner ("Zellner") ceased working for SEIU/WI JOBS NOW! on or about March 4, 2012 not on May 5, 2012 as erroneously alleged by Complainant. Zellner did not provide her employer/occupation information to either the Friends of Mason or Maureen May-Grimm for Assembly. See Complainant's Ex. 5. Friends of Mason correctly listed her employer and occupation but Maureen May-Grimm for Assembly did not correctly list her employer and occupation information. Zellner does not have firsthand knowledge but presumes that when she donated to Maureen May-Grimm for Assembly, that Committee believed she was still working for her former employer, SEIU/WI Jobs Now!

OFFICE OF THE
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION
2012 NOV 26 PM 10:57
TELEPHONE ROOM

13044350323

Mr. Jeff S. Jordan
Office of the General Counsel
Federal Election Commission
November 19, 2012
Page 2 of 2

Second, Zellner donated money to the Wall for Congress campaign ("Wall Campaign") on or about 10/3/2011 - Transaction ID: C19200178. Attached hereto and incorporated herein as Ex. "A" is Wall Campaign FEC Form 3, dated 1/31/2012. Under name of employer and occupation the Wall Campaign listed "Information Requested" for Zellner. Thereafter on or about April 17, 2012, the Wall Campaign filed an amended FEC Form 3. Attached hereto and incorporated herein as Ex. "B" is Wall Campaign amended FEC Form 3. At that time the campaign supplemented (as required by law) information that it had received and/or was missing from the original filing dated 1/31/2012. Therefore, at the time the amended FEC Form 3 was filed with the FEC, (April 17, 2012) Zellner's employer was the Wall Campaign and was listed accordingly.

Third, Complainant correctly alleges that Zellner was employed by SEIU/WI JOBS NOW! on or about January 18, 2012. The reason Zellner was listed as the contact person on the Wall Campaign website going back to 2011 and early 2012 was because the computer program used by the Wall Campaign web site retroactively populates the contact person information.

On or about March 5, 2012 when Zellner became the Wall Campaign Manager, her name and contact information was put into the Wall Campaign's web site which then automatically updated her contact information on all current and prior press releases that were stored on the Wall Campaign's web site. Attached hereto and incorporated herein as Ex. "C" is an explanation by the Wall Campaign's web designer. In further support of this argument, Respondents were able to obtain original campaign press releases from the website Wispolitics.com. Those releases dated October 5, 2011, January 18, 2012 and February 29, 2012 respectively show that Zellner was not the contact person for the Wall Campaign nor even associated with the Wall Campaign. Attached hereto and incorporated herein as Ex. "D" are those original Wall Press Releases. Please compare Respondents' Ex. "D" to Complainant's Ex. 9 & 10.

Fourth, towards the end of February 2012, Zellner attended a political training event in Washington, DC. She requested and received vacation time from her employer SEIU/WI JOBS NOW! to attend the event. The Wall Campaign did reimburse Zellner for that training event as she was going to be starting with the Wall campaign in less than a week.

For the foregoing reasons, the Complaint should be dismissed, and the matter closed.

Very truly yours,


Michael S. Maistelman
Counsel for Respondents

Enclosures

MSM/abm

13044350324

FEC
FORM 3REPORT OF RECEIPTS
AND DISBURSEMENTS

For An Authorized Committee

Office Use Only

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type
over the lines.

12FE4M5

Wall for Congress

ADDRESS (number and street)

P.O. Box 1145

Check if different
than previously
reported. (ACC)

Green Bay

WI

54305

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

STATE ▼ DISTRICT



C00503854

3. IS THIS
REPORTNEW
(N)

OR

AMENDED
(A)

WI

08

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:



April 15 Quarterly Report (Q1)



July 15 Quarterly Report (Q2)



October 15 Quarterly Report (Q3)



January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:



Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

M M / D D / Y Y Y Y

in the
State of

W I

(c) 30-Day POST-Election Report for the:



General (30G)



Runoff (30R)



Special (30S)

Election on

M M / D D / Y Y Y Y

in the
State of

W I

5. Covering Period

10 01 2011

through

12 31 2011

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Florence Magnuson

Signature of Treasurer

Florence Magnuson

[Electronically Filed]

Date

01 31 2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office
Use
OnlyFEC FORM 3
(Revised 02/2003)

Ex. A

13044350325

SCHEDULE A (FEC Form 3) **ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 130 OF 399
(check only one)
☒ 11a ☐ 11b ☐ 11c ☐ 11d
12 13a 13b 14 15

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
Wall for Congress

Full Name (Last, First, Middle Initial)
Dane Zahn

A. Mailing Address 2089 Rudden Rd.

City State Zip Code
Greenleaf WI 54126

FEC ID number of contributing
federal political committee.

C

Name of Employer
Information Requested

Occupation
Appliance Dealer

Receipt For: 2012

☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date

50.00

Date of Receipt

12 06 2011

Transaction ID : C19254080

Amount of Each Receipt this Period

50.00

Full Name (Last, First, Middle Initial)
Paula Zellner

B. Mailing Address 619 W. Richmond St.

City State Zip Code
Shawano WI 54166

FEC ID number of contributing
federal political committee.

C

Name of Employer
Information Requested

Occupation
Information Requested

Receipt For: 2012

☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date

150.00

Date of Receipt

10 03 2011

Transaction ID : C19200178

Amount of Each Receipt this Period

150.00

Full Name (Last, First, Middle Initial)
Judy Ziewacz

C. Mailing Address 5623 Winnequah Rd.

City State Zip Code
Monona WI 53716

FEC ID number of contributing
federal political committee.

C

Name of Employer
RETIRED

Occupation
RETIRED

Receipt For: 2012

☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date

100.00

Date of Receipt

12 07 2011

Transaction ID : C19254356

Amount of Each Receipt this Period

100.00

SUBTOTAL of Receipts This Page (optional)

300.00

TOTAL This Period (last page this line number only)

FEC
FORM 3REPORT OF RECEIPTS
AND DISBURSEMENTS
For An Authorized Committee

Office Use Only.

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12FE4M5

Wall for Congress

ADDRESS (number and street)

P.O. Box 1145

☒ Check if different than previously reported. (ACC)

Green Bay

WI

54305

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C00503854

CITY ▲

STATE ▲

ZIP CODE ▲

STATE ▼ DISTRICT

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NEW (N)

OR

☒

AMENDED (A)

WI

08

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- ☐ October 15 Quarterly Report (Q3)
- ☒ January 31 Year-End Report (YE)

☐ Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

☐

Primary (12P)

☐

General (12G)

☐

Runoff (12R)

☐

Convention (12C)

☐

Special (12S)

Election on

MM / DD / YYYY

In the State of

WI

(c) 30-Day POST-Election Report for the:

☐

General (30G)

☐

Runoff (30R)

☐

Special (30S)

Election on

MM / DD / YYYY

In the State of

WI

5. Covering Period

10 / 01 / 2011

through

12 / 31 / 2011

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Florence Magnuson

Signature of Treasurer

Florence Magnuson

[Electronically Filed]

Date

04 / 17 / 2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office
Use
OnlyFEC FORM 3
(Revised 02/2003)

Ex. B

13044350327

SCHEDULE A (FEC Form 3) **ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 130 OF 397

☒ 11a ☐ 11b ☐ 11c ☐ 11d
☐ 12 ☐ 13a ☐ 13b ☐ 14 ☐ 15

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NAME OF COMMITTEE (In Full)
Wall for Congress

Full Name (Last, First, Middle Initial)
Dane Zahn

A. Mailing Address 2089 Rudden Rd

City State Zip Code
Greenleaf WI 54126-9654

FEC ID number of contributing
federal political committee.

C

Name of Employer
Information Requested

Occupation
Appliance Dealer

Receipt For: 2012

☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date

50.00

Date of Receipt

12 / 06 / 2011

Transaction ID : C19254080

Amount of Each Receipt this Period

50.00

Full Name (Last, First, Middle Initial)
Paula Zellner

B. Mailing Address W3034 Twin Creek Road

City State Zip Code
Porterfield WI 54159-9747

FEC ID number of contributing
federal political committee.

C

Name of Employer
Wall for Congress

Occupation
Campaign Manager

Receipt For: 2012

☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date

150.00

Date of Receipt

10 / 03 / 2011

Transaction ID : C19200178

Amount of Each Receipt this Period

150.00

Full Name (Last, First, Middle Initial)
Judy Ziewacz

C. Mailing Address 5623 Winnequah Rd

City State Zip Code
Monona WI 53716-3064

FEC ID number of contributing
federal political committee.

C

Name of Employer
RETIRED

Occupation
RETIRED

Receipt For: 2012

☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date

100.00

Date of Receipt

12 / 07 / 2011

Transaction ID : C19254356

Amount of Each Receipt this Period

100.00

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

300.00



PRESS RELEASES

Wall Campaign: Jamie Wall announces run to represent Wisconsin's Eighth Congressional District

10/5/2011

Contact: Wall for Congress (920) 370-7786

GREEN BAY, WI— Jamie Wall today announced his campaign to build a strong future for Wisconsin's Eighth Congressional District. Born and raised on a family dairy farm in northeast Wisconsin, Wall now runs his own small business in Green Bay. He knows first-hand what it takes to bring people together to solve problems, improve the economy, and create jobs.

"I'm running for Congress because I love northeast Wisconsin, and we deserve better than we're getting from Washington," Wall said. "Real people are suffering in this economy, and our politicians are squabbling with each other instead of working together to do what's right for the people who elected them."

"It doesn't have to be this way. We can turn things around, both here in Wisconsin and across the country. But it's going to take leadership that's focused on improving the economy, creating jobs, and protecting the way of life we enjoy here in Wisconsin. We need people in Congress who will find practical ways to preserve Medicare and Social Security instead of working to destroy them. We need to do better. And I believe we can."

Wall was raised on his family's dairy farm and grew up hunting and fishing with family and neighbors. After graduating as valedictorian of his class at Wrightstown High School, he was the first in his family to go to college. He earned an honors degree in History and Political Science at the University of Wisconsin-Madison and became the first UW student in a generation to win a Rhodes Scholarship. Wall helped establish the northeast Wisconsin economic development organization now known as the New North and has extensive experience helping businesses in Wisconsin and around the country solve complex strategic and operational problems.



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EX.D



Wall Campaign: Jamie Wall earns spot in DCCC's competitive Red-to-Blue Program
1/18/2012

Contact: Stephanie Rodgers, 920-370-2168, stephanie@jamiwall.com

Jamie Wall (WI-08) announced today that he earned a spot on the Democratic Congressional Campaign Committee's (DCCC) highly competitive Red-to-Blue program. He has surpassed demanding fundraising, organizing, and infrastructure goals and skillfully demonstrated to voters that he is a problem-solver who will protect the middle class when elected to Congress.

"I am honored that so many people in Wisconsin's 8th Congressional District have joined our grassroots campaign to create jobs, stand up for middle class families, protect Medicare and Social Security and reignite the American dream," said Jamie Wall. "The early strength we have demonstrated by being named to the Red to Blue program means we have the support, confidence, and momentum it takes to win in November."

"Born and raised on a dairy farm in Northeast Wisconsin, Jamie Wall knows first-hand the value of hard work and what it takes to invest in small businesses and create jobs," said Chairman Steve Israel. "Jamie is building a formidable, grassroots campaign that offers Wisconsinites an alternative to the extreme, out of touch Republican agenda that ends Medicare just to give out tax breaks to billionaires and rewards partisan ideology over common sense solutions."

The DCCC's Red to Blue program highlights top Democratic campaigns across the country, and offers them financial, communications, grassroots, and strategic support. The program will introduce Democratic supporters to new, competitive candidates in order to help expand the fundraising base for these campaigns.



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Wall Campaign: Announces 1000th donor
2/29/2012

Contact: Stephanie Rodgers, 920-370-2168, stephanie@jamiwall.com

Jamie Wall (WI-08) announced today that John Rybski of Algoma, Wisconsin is the 1000th donor to his campaign for Congress. Rybski, a retired small business owner, contributed \$25 to Wall's campaign online.

"I'm deeply concerned with the dysfunctional Congress that we've had over the past two years," said Rybski. "Politicians have been putting party before principle. I support Jamie because he will put principle before political gain and work for the good of the people."

Since launching his campaign in October, Wall has built a strong campaign focused on grassroots support. Fundraising has been a strength for Wall – he raised almost \$60,000 more than his incumbent opponent in his first quarter in the race.

"I'm grateful for John and the 999 others who have supported my race in the past five months," said Wall. "My grassroots support proves that Northeast Wisconsin is ready for change and that we will win this race in November."



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